

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF IOWA

IN RE:)	CHAPTER 7
)	CASE NO. 23-00748-als7
DAKOTAH D. REYNOLDS,)	
)	TRUSTEE'S MOTION TO COMPEL
Debtor.)	TURNOVER OF PROPERTY
)	

COMES NOW Charles L. Smith, Trustee, and states to the Court for his Motion to Compel Turnover of Property pursuant to 11 U.S.C. §542, the following:

1. The Debtor filed a Petition for relief under Chapter 7 on June 14, 2023, and the first meeting of creditors was held on July 6, 2023.

2. The Debtor has the following asset in her possession which is not exempt, and which should be turned over to the Trustee to be administered in this bankruptcy estate: 2021 and 2022 state and federal income tax returns and all non-exempt income tax refunds.

WHEREFORE, Charles L. Smith, Trustee prays that the Debtor be ordered to turnover possession of said property to the Trustee; and for such other and further relief as is just.

DATED: August 28, 2023.

/s/ Charles L. Smith

Charles L. Smith, Trustee AT0007415

Telpner Peterson Law Firm, LLP

25 Main Place, Suite 200

Council Bluffs, IA 51503

Telephone: (712) 325-9000

Facsimile: (712) 328-1946

E-mail: csmith@telpnerlaw.com

The undersigned hereby certifies under penalty of perjury, that a copy of this document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing and by first class mail on August 28, 2023, to the following non-CM/ECF participants:

/s/ Denise Parish